LEGIONELLA MANAGEMENT POLICY

Water Hygiene Control Policy

Sites:

- **Mill Lane Sports Field (workshop / changing facilities)**
- **St Andrew's Community Centre**
- **Saxilby Waterfront Public Facilities**

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SAXILBY WITH INGLEBY PARISH COUNCIL

Document control

1. Policy statement

Saxilby with Ingleby Parish Council recognises its responsibility to protect employees, volunteers, contractors, hirers, sports users and members of the public from risks associated with Legionella bacteria in water systems at premises it owns or manages.

The Council will implement suitable arrangements to identify, assess and control the risk of Legionella growth and exposure. This policy is to be read alongside the current site-specific Legionella risk assessments, written control schemes, water system schematics and monitoring records. Where those documents specify different outlets, methods, frequencies or control limits, the Responsible Person must follow the competent, site-specific arrangements and resolve any inconsistency.

The policy is informed by the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, COSHH Regulations 2002, HSE Approved Code of Practice L8 and HSG274 Part 2, as applicable.

2. Scope

This policy applies to Council-owned or Council-managed water systems at the following premises:

- Mill Lane Sports Field – workshop, welfare, changing-room and shower facilities, wash basins, water heaters, external taps and associated pipework or storage, where fitted.
- St Andrew's Community Centre – bar and servery sinks, kitchen outlets and equipment, public and accessible toilets, changing rooms and showers, staff facilities, water heaters, storage and associated pipework, where fitted.
- Bridge Street Public Toilets – public washbasins, taps, toilet-area water outlets, any cleaning/service outlets, water heaters and associated pipework or storage, where fitted.

The policy applies to all people involved in managing, monitoring, maintaining or using these facilities. Equipment and outlets listed above are included only where actually present; the site asset register and risk assessment must confirm the installed systems.

3. Objectives

- Identify and assess Legionella risks in relevant water systems.
- Maintain systems in a safe condition and minimise stagnation and conditions that encourage bacterial growth.
- Apply suitable temperature control and other measures specified by the risk assessment.

- Operate a planned programme of monitoring, flushing, cleaning, inspection and maintenance.
- Ensure responsible persons and contractors are competent for their assigned duties.
- Keep clear, accurate records and promptly address failures or defects.
- Review this policy and the effectiveness of controls regularly.

4. Responsibilities

4.1 Parish Council – Duty Holder

- Approve this policy and ensure suitable resources are available.
- Appoint a Responsible Person (Clerk) and at least one deputy in writing (Grounds Manager and Facilities Supervisor).
- Receive reports on significant risks, control failures and overdue corrective actions.
- Review Legionella management arrangements at least annually.

4.2 Responsible Person

- Arrange suitable and sufficient risk assessments and reviews by a competent person.
- Ensure monitoring, flushing, inspections and servicing are completed at the required frequencies.
- Maintain the asset register, outlet list and water system schematics.
- Arrange competent contractors, retain their service reports and track remedial actions to completion.
- Ensure people carrying out checks are trained, authorised and aware of scalding and aerosol risks.
- Report significant concerns and non-compliance to the Council.

4.3 Employees and volunteers

- Maintain the Legionella logbook and site-specific records for all three premises.
- Follow the relevant written procedures and complete only checks for which they are trained and authorised.
- Record checks accurately and report defects, failed readings, missed checks or unusual water conditions promptly.

4.4 Contractors

- Demonstrate appropriate competence and follow the Council's control arrangements.
- Report defects, risks or failures promptly and provide written service records.

5. Legionella risk assessment and system information

A competent person must undertake a suitable and sufficient risk assessment for each relevant premises and water system. The assessment should identify the systems, people at risk, potential sources of exposure, existing controls, required monitoring and remedial actions.

Assessments must be reviewed at the frequency specified by the competent assessor and whenever there is a significant change to a building, water system, use or occupancy; after prolonged closure; following a control failure; or after suspected or confirmed contamination. The source management plan suggests review at least every two years, while this policy requires an annual management review; the risk assessment itself must be reviewed sooner whenever circumstances or the assessor indicate.

The logbook should contain current water system schematics and an asset register identifying, where fitted, the incoming mains supply, water heaters, storage vessels, showers, thermostatic mixing valves (TMVs), sentinel outlets, little-used outlets and redundant pipework.

6. Control measures

6.1 Temperature control

Temperature control should be used where suitable and in accordance with the risk assessment and written scheme. General target values in the source management plan are:

- Cold water: below 20°C within two minutes of running.
- Hot water storage/calorifier: 60°C minimum, where applicable.
- Hot sentinel outlets: at least 50°C within one minute, except where TMVs or other controls require a different safe measurement procedure.
- TMV mixed water: typically 38–43°C, subject to the required safe outlet temperature and the system design.

Monthly monitoring should include representative sentinel hot and cold outlets, including nearest and furthest outlets as specified by the written scheme. Rotate additional outlets if required. Record actual temperatures, time to temperature, date, outlet ID and person completing the check. Investigate and escalate readings outside the site's action limits.

6.2 Little-used outlets and weekly flushing

An outlet unused for more than seven days should be considered a little-used outlet unless the site-specific assessment defines another approach. Maintain a register showing location, outlet type, flushing frequency, dates completed and responsible person.

Flush identified little-used outlets at least weekly where required by the written scheme. The supplied management plan describes running the outlet fully open for a minimum of two minutes; however, the actual duration and method must follow the competent site-specific scheme and be sufficient to replace standing water with fresh water. Do not assume every outlet at every site requires the same flushing regime.

Flush safely to drain where possible, minimise splashing and aerosol generation, and avoid breathing spray. Take account of hot-water/scald risks. Record each outlet, whether flushing was completed, duration or method where required, and any reason for non-completion.

6.3 Shower facilities

Showers can generate aerosols and must receive the enhanced controls specified in the risk assessment. Where showers are fitted, inspect and clean/descale shower heads and flexible hoses at least quarterly, or at the frequency specified by the written scheme. Record completion. Replace worn or damaged hoses and arrange annual deep cleaning or replacement where required by the scheme.

6.4 Water heaters, storage and TMVs

Where hot-water cylinders or calorifiers are fitted, monitor storage temperature at the required frequency; the supplied plan specifies monthly checks and a target of at least 60°C where applicable. Inspect tanks, insulation, access, corrosion and contamination as required by the risk assessment.

Where TMVs are fitted, arrange periodic inspection and testing by a competent person, including correct operation, fail-safe function and temperature settings. The source plan suggests annual servicing where applicable; follow the site-specific scheme and manufacturer/competent contractor recommendations.

6.5 Water sampling

Routine sampling is not automatically required where risk assessment, temperature control and monitoring demonstrate effective control. Consider sampling where the risk assessment recommends it, control temperatures cannot be maintained, a building has been closed for a prolonged period, Legionella has previously been detected, or users may be particularly vulnerable. Sampling and analysis should be arranged through a suitably competent provider and an appropriately accredited laboratory.

7. Monitoring programme

The Responsible Person must maintain a site-specific schedule and ensure records are completed for each premises. The following is the general programme in the supplied management plan; the risk assessment and written scheme determine the final tasks and frequencies.

Frequency	General actions (where applicable and required by the written scheme)
Weekly	Flush identified little-used outlets and showers during periods of low use; inspect visible outlets for leaks, damage, poor flow, scale, unusual colour/odour; record completion and defects.
Monthly	Check representative sentinel hot and cold outlet temperatures and water-heater/storage temperatures where fitted and required; review records and investigate failures.
Quarterly	Clean and descale shower heads and hoses where fitted; inspect visible water-system components as specified.
Six-monthly	Review the asset register and little-used outlet list; inspect cold-water storage tank if fitted, accessible and required by the scheme.
Annually	Review this policy and monitoring records; review risk assessment recommendations; arrange TMV servicing where applicable; review training and corrective actions.

8. Building closures and reopening

Where all or part of a premises is unused for more than seven days, the Responsible Person must apply the closure and flushing arrangements specified in the site-specific written scheme. Before reopening after an extended closure, the source plan calls for flushing outlets, thorough flushing of shower systems, temperature checks, cleaning shower heads where necessary and recording completion. The source plan advises seeking specialist water-hygiene advice after a closure exceeding one month. Do not reopen a system until any necessary safety checks or remedial actions required by the risk assessment have been completed.

9. Training and competence

People responsible for implementing this policy must receive instruction and training appropriate to their duties. This may include Legionella awareness, safe flushing, temperature monitoring, record keeping, scald and aerosol precautions, and reporting/escalation arrangements. Refresher training should be provided when required.

10. Records and logbook

Maintain a Legionella logbook with separate, clearly identified records for Mill Lane Sports Field, St Andrew's Community Centre and Bridge Street Public Toilets. It should include:

- Current policy, risk assessments and written control schemes.
- Responsible Person and deputy appointments.
- Water system schematics, asset register, sentinel outlet list and little-used outlet register.
- Weekly flushing records and monthly temperature readings.
- Shower cleaning/descaling records, where fitted.
- Water heater, tank and TMV inspection/service records, where applicable.
- Contractor reports, sampling results where undertaken, training records and corrective-action evidence.

The supplied management plan specifies a minimum five-year retention period. Retain records for at least this period, or longer where required by law, the Council's retention schedule, insurer or competent advice.

11. Non-compliance and corrective action

Examples of failures include temperatures outside the site's action limits, missed flushing, outlets that cannot be flushed, damaged equipment, defects, evidence of contamination or missing records. Report concerns promptly to the Responsible Person. Record the issue, immediate precautions, person notified, corrective action, responsible person and date closed. The Responsible Person must investigate promptly, arrange competent advice or repairs as needed, and escalate significant failures to the Parish Council.

12. Annual review and reporting

At least annually, the Responsible Person should review whether monitoring is complete, whether corrective actions are closed, whether maintenance and training are up to date, whether the asset and outlet lists remain accurate, and whether the risk assessments and written schemes remain suitable. Provide a report to the Council covering compliance, outstanding actions, works completed, incidents and recommendations. Review this policy sooner after significant changes, failures or changes to relevant guidance.

13. Approval

This policy is a draft until formally approved by Saxilby with Ingleby Parish Council. The Council should confirm that the policy matches the current risk assessments and written control schemes for all three premises before adoption.

Associated documents:

1. Legionella risk assessment for each premises.
2. Water system schematic and asset register for each premises.
3. Responsible Person and deputy appointment records.
4. Weekly flushing records / little-used outlet register.
5. Water temperature monitoring sheets.
6. Shower cleaning and descaling records, where fitted.
7. Water heater, tank and TMV inspection records, where applicable.
8. Contractor service reports, sampling results and corrective-action log.
9. Training records and annual review reports.